



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 26, 2020

By Email and ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Kay Ann Walker, 19 Cr. 929 (AKH)

Dear Judge Hellerstein:

With the defendant's consent, the Government respectfully requests to adjourn the pretrial conference in the above-referenced case, currently scheduled for October 30, 2020, until January 2021 or another date subject to the convenience of the Court. Defense counsel has informed the Government that the defendant intends to enter a plea of guilty at the next-scheduled conference date. However, the Government understands that there are not, at this time, "specific reasons that the plea . . . in th[is] case cannot be further delayed without serious harm to the interests of justice," and a guilty plea therefore cannot be entered remotely at this time. See Coronavirus Aid, Relief, and Economic Security (CARES) Act, Pub. L. No. 116-136, § 15002(b)(2)(B), 134 Stat. 281, 527-30 (2020). Accordingly, the Government seeks an adjournment until January 2021 or another date convenient to the Court at which time the defendant may be able to enter a plea in-person.

The Government also respectfully submits, with defense counsel's consent, that the time between October 30, 2020 and the next conference date be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), as the Government and the defendant are finalizing plea discussions, and the proposed exclusion would be in the interests of justice.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: /s/ Kaylan E. Lasky
Kaylan E. Lasky
Assistant United States Attorney
(212) 637-2315

cc: Robert Baum, Esq.

The pretrial conference is adjourned until January 7, 2021 at 11:00am. Time is excluded in the interest of justice.
M. K. [Signature]
10-26-2020